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Attorneys for Plaintiffs

L.C., I.H., A.L., and Antonia Salas Ubaldo

**UNITED STATES DISTRICT COURT FOR THE
CENTRAL DISTRICT OF CALIFORNIA**

L.C., a minor by and through her
guardian *ad litem* Maria Cadena,
individually and as successor-in-interest
to Hector Puga; I.H., a minor by and
through his guardian *ad litem* Jasmine
Hernandez, individually and as
successor-in-interest to Hector Puga;
A.L., a minor by and through her
guardian *ad litem* Lydia Lopez,
individually and as successor-in-interest
to Hector Puga; and ANTONIA SALAS
UBALDO, individually;

Plaintiffs,

vs.

STATE OF CALIFORNIA; COUNTY
OF SAN BERNARDINO; S.S.C., a
nominal defendant; ISAIAH KEE;
MICHAEL BLACKWOOD;
BERNARDO RUBALCAVA; ROBERT
VACCARI; JAKE ADAMS; and DOES
6-10, inclusive,

Defendants.

Case No. 5:22-cv-00949-KK-SHK

Honorable Kenly Kiya Kato

**DECLARATION OF HANG D. LE IN
SUPPORT OF PLAINTIFFS'
MOTIONS IN LIMINE NOS. 1-5**

1 I, Hang D. Le, hereby declare as follows:

2 1. I am an attorney duly licensed to practice law in the United States
3 District Court for the Central District of California. I make this Declaration in
4 Support of Plaintiffs Motions in Limine Nos. 1-5. I have personally familiar with the
5 matters stated herein and could testify competently thereto if called.

6 2. Attached hereto as “**Exhibit 1**” is a true and correct copy of the
7 relevant portions of the November 4, 2024 Deposition Transcript of Bernardo
8 Rubalcava.

9 3. Attached hereto as “**Exhibit 2**” is a true and correct copy of the
10 relevant portions of the November 4, 2025 Deposition Transcript of Bernardo
11 Rubalcava.

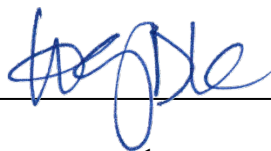
12 4. Attached hereto as “**Exhibit 3**” is a true and correct copy of the
13 relevant portions of the November 12, 2024 Deposition Transcript of Jake Adams.

14 5. Attached hereto as “**Exhibit 4**” is a true and correct copy of the
15 relevant portions of the Rule 26 Report of Plaintiffs’ police practices expert Roger
16 Clark.

17 6. Attached hereto as “**Exhibit 5**” is a true and correct copy of the
18 relevant portions of the November 14, 2024 Deposition Transcript of Robert
19 Vaccari.

20 7. Attached hereto as “**Exhibit 6**” is a true and correct of the relevant
21 portions of the December 30, 2024 Deposition Transcript of Betzabeth Gonzalez.

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24 I declare under penalty of perjury under the laws of the State of California and the
25 United States of America that the foregoing is true and correct. Executed this 24th
26 day of April 2025, in Los Angeles, California.

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Hang D. Le

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